

KAMER ZUCKER ABBOTT
 Jen J. Sarafina #9679
 Nicole A. Martin #13423
 3000 West Charleston Boulevard, Suite 3
 Las Vegas, Nevada 89102-1990
 Tel: (702) 259-8640
 Fax: (702) 259-8646
 jsarafina@kzalaw.com
 nmartin@kzalaw.com

Attorneys for Defendant
 NevadaPure, LLC

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

JANE DOE,)	Case No. 2:19-cv-01664-JCM-VCF
)	
Plaintiff,)	
)	
vs.)	<u>JOINT STIPULATION AND ORDER</u>
)	<u>TO STAY PROCEEDINGS PENDING</u>
)	<u>RESOLUTION</u>
NEVADAPURE, LLC, a Nevada limited liability)	
company dba SHANGO LAS VEGAS,)	<u>(Fourth Request)</u>
)	
Defendant.)	
)	

Plaintiff Jane Doe ("Plaintiff"), by and through her counsel, Melanie Hill Law PLLC, and Defendant NevadaPure, LLC dba Shango Las Vegas ("Defendant"), by and through its counsel, Kamer Zucker Abbott, stipulate and request that the Court stay these proceedings for twenty-one (21) days, through and including September 30, 2020, to allow the parties to memorialize the terms of an agreed upon settlement. In support of this Stipulation and Request, the parties state as follows:

1. The parties requested a stay of proceedings for 30 days on August 7, 2020 in an effort to conserve both the parties' and the court's limited time and resources due to the partial shutdown. ECF No. 32.

2. This request for stay was granted on August 14, 2020 and expired on September 2, 2020. ECF No. 35.

3. The parties have been engaging in resolution discussions and believe they have agreed in principle on a resolution.

4. The parties request a stay of proceedings for twenty-one days, up to and including September 30, 2020, to allow them time to memorialize and finalize the resolution of this matter.

5. This request to stay proceedings is not sought for any improper purpose or other reason of delay. Rather, it is sought only to conserve the parties' and court's respective resources and efficiently resolve this matter.

WHEREFORE, the parties respectfully request that the Court stay proceedings in this case for the next twenty-one (21) days, up to and including September 30, 2020.

DATED this 9th day of September, 2020.

Respectfully submitted,

MELANIE HILL LAW PLLC

/s/ Melanie A. Hill

Melanie A. Hill #8796
520 S. 7th Street, Suite A
Las Vegas, Nevada 89101
Tel: (702) 362-8500
Fax: (702) 362-8505

Attorney for Plaintiff
Jane Doe

Respectfully submitted,

KAMER ZUCKER ABBOTT

/s/ Nicole A. Martin

Jen J. Sarafina #9679
Nicole A. Martin #13423
3000 West Charleston Boulevard, Suite 3
Las Vegas, Nevada 89102
Tel: (702) 259-8640
Fax: (702) 259-8646

Attorneys for Defendant
NevadaPure, LLC

IT IS SO ORDERED:


UNITED STATES DISTRICT COURT JUDGE

DATED: September 18, 2020